

FEDERAL ENERGY REGULATORY COMMISSION
Office of Energy Projects
Division of Dam Safety and Inspections – Chicago Regional Office
Federal Building - 230 South Dearborn Street, Room 3130
Chicago, Illinois 60604
(312) 596-4430 Office

In reply, refer to: P-346

August 3, 2023

VIA ELECTRONIC MAIL

Mr. Matthew J. Ryan, PE
Chief Dam Safety Engineer
Minnesota Power
MRyan@mnpower.com

Re: Blanchard Project (FERC No. P-346)

- 2023 Dam Safety Inspection Follow-up
- Minnesota Power's (MP's) March 28, 2023 Letter with 2022 Annual DSSMR

Dear Mr. Ryan:

The triennial FERC dam safety inspection was conducted on June 26, 2023 for the Blanchard Hydroelectric Project No. 346. The project features were visually inspected with no significant deficiencies observed that would require immediate remedial action. The annual Dam Safety Surveillance and Monitoring Report (DSSMR) was reviewed as part of the inspection process.

Our comments are listed below and should be addressed as noted. The next annual (2023) DSSMR submittal is due by **April 1, 2024**. All comments (except for #1) should be addressed and submitted by **April 1, 2024**.

1. The FERC box on the Notification Flowchart of the Emergency Action Plan (EAP) should be updated and submitted by **December 31, 2023**. Please remove Olaf Weeks (Branch Chief - retired) and replace him with Scott Airato (Branch Chief). His office number is 312-596-4431. File a complete electronic copy of your revised EAP. Do not send individual pages or sections.
2. DSSMR Section 2 (Field Observations) states that "A grout bag that was part of the 2015 repairs was dislodged at bridge pier 1 downstream of the dam. The repair is scheduled for the summer of 2023." A summary report with photographs that documents the completed work should be included in the DSSMR.

3. DSSMR Section 3 (Instrumentation Evaluation) states that “In order to reduce sight distances to points 3 and 4 and survey error, viable locations for adding control points to the east side of the dam will be pursued with increased focus in 2023.” Status updates should continue to be provided in the DSSMR.
4. DSSMR Section 4 (Conclusions) states that “The replacement of the powerhouse gantry crane has started. The crane is currently in production and a contractor has been selected for the installation contract, which is scheduled to begin in June 2023. Rehabilitation/replacement of head gates and tainter gates are planned in subsequent years following the replacement of the gantry crane.” Status updates should continue to be provided in the DSSMR.
5. You notified us that the EAP was activated under high flow conditions in April 2023.
 - a. That EAP activation is considered a safety-related incident (condition affecting the safety of a project or its works) and requires an 18 CFR § 12.10 (a) written report describing the incident and emergency response. The written report should also include your analysis of the incident and your specific plans for any necessary project improvements or additional prevention measures. The 12.10 (a) incident report should be submitted with the 2023 DSSMR.
 - b. Operational records (peak headwater and tailwater elevations, gate openings, piezometer well readings...) and documentation (e.g., data, plots, after-action flood reports, etc. from USGS, NWS, FEMA, etc.) should be included in the 2023 DSSMR in order to capture that event.
 - c. The 2023 DSSMR should also include a discussion and an evaluation of the event as it relates to how the development responded throughout (before, during, after) that event. The discussion should incorporate additional information such as data gathered, photos, videos, evaluation of rating curves, phreatic levels in embankments, uplift under structures, etc.
6. The Dam Safety Surveillance and Monitoring Plan (DSSMP) should include the requirement to obtain surveillance and monitoring of pertinent instrumentation during unusual loading events (floods, unusually low tailwater). The DSSMP should be revised and submitted.

The DSSMR meets the intent of the FERC's Engineering Guidelines for the Evaluation of Hydropower Projects, Chapter 14 – Dam Safety Performance Monitoring Program, Appendix K – Dam Safety Surveillance and Monitoring Report Outline. The FERC's Engineering Guidelines should be reviewed to continue to improve the DSSMR.

File your submittal using the Commission's eFiling system at <https://www.ferc.gov/ferc-online/overview>. When eFiling, select Hydro: Dam Safety and Chicago Regional Office from the eFiling menu. The cover page of the filing must indicate that the material was eFiled. For assistance with eFiling, contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

We appreciate the assistance that the Minnesota Power staff provided during the inspection. You may contact Ms. Angela Damron at (312) 596-4454 or me at (312) 596-4430 if you have any questions regarding this letter.

Sincerely,

Kevin Griebenow, P.E.
Regional Engineer

cc: VIA ELECTRONIC MAIL

Mr. Kyle R. Maher
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